From: Nathan Sanders

Sent: Thursday, October 29, 2020 3:06 PM

**To:** Margaret Sams Gratz

Cc: Tara Farr; wol@luckettlawfirm.com; Phil Elbert; Salcido, Robert; Diana Hester; Jackie Elbert; Rebecca

Parrish

**Subject:** U.S. ex rel. Jehl v. GGNSC Southaven, et al.

**Attachments:** Rule 30(b)(6) Deposition Notice to GGNSC Administrative Services.pdf; Rule 30(b)(6) Deposition

Notice to GGNSC Clinical Services.pdf; Rule 30(b)(6) Deposition Notice to GGNSC Southaven.pdf

## Margaret,

As discussed, here are Rule 30(b)(6) deposition notices for each of the three defendants, which notices are all substantially similar. The dates in the notices are placeholders. Please let me know some dates in early December that will work for you and your clients.

As for Mr. Jehl's deposition, does November 18 or November 24 work for you? Let's discuss further whether these depositions should be in person or via Zoom.

In addition, please let me know if you've heard from your client on the email proposal.

Thank you, Nathan